

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT **FILED**

for the

Northern District of Texas

February 3, 2021

KAREN MITCHELL
CLERK, U.S. DISTRICT
COURT

United States of America
v.
Christian Michael Mackey

Case No.

3:21-MJ-105-BK

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 29, 2021 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

Code Section

18 U.S.C. 922(d)

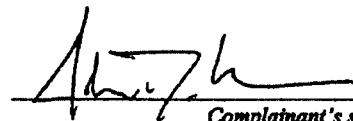
Offense Description

Unlawful Sale or Disposition of a Firearm or Ammunition

This criminal complaint is based on these facts:

See Attached Affidavit of SA John Moore.

☐ Continued on the attached sheet.



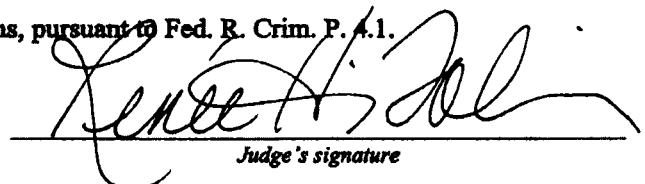
Complainant's signature

Special Agent John Moore, FBI

Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: February 3, 2021



Judge's signature

City and state: Dallas, Texas

RENÉE HARRIS TOLIVER, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF
APPLICATIONS FOR AN ARREST WARRANT

I, John "Jack" Moore, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been since 2016. I am currently assigned to a squad in Dallas, Texas, that is responsible for investigating Domestic Terrorism cases. I am responsible for conducting investigations into various threats, including racially motivated violent extremism, weapons of mass destruction violations, and violent anti-government extremists. I have received training in such areas as counter terrorism, domestic terrorism, financial analysis, financial investigative methods and applications, techniques for disguising and transmitting the proceeds of illegal activities, and asset forfeiture. I have also received training regarding computers and digital evidence. I have participated in investigations into domestic terrorism, wire fraud, securities fraud, public corruption, drug trafficking, healthcare fraud, and crimes against children. These investigations have often involved the use of physical surveillance, cooperating witnesses, financial and telephone toll record analysis, the execution of search and arrest warrants, and the debriefing of witnesses and subjects. I also have experience in the review of evidence obtained during the execution of search warrants.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit

is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. 922(d) have been committed by Christian Michael Mackey, namely that, on or about January 29, 2021, Christian Michael Mackey did knowingly sell or otherwise dispose of any firearm or any person knowing or having reasonable cause to believe that such person had been convicted in any court of a crime punishable by imprisonment for a term exceeding one year.

PROBABLE CAUSE

4. Since in or around July 2019, the FBI has been investigating the White Racially Motivated Violent Extremist (WRMVE) group Iron Youth. Iron Youth is a self-proclaimed National Socialist and White Nationalist group. Iron Youth has made claims that it is dedicated to militancy, political terror, and "Siege" ideology. "Siege" ideology refers to the 1992 book *Siege* written by American Neo-Nazi James Mason, in which Mason provides chapters of instruction on instigating anti-government terrorist attacks in order to start a race war.

5. In addition to an investigation led by the Dallas Field Office, other FBI offices have investigations into particular targets associated with Iron Youth, including the FBI field office in San Antonio. FBI San Antonio issued search warrants for the Instagram accounts for certain Iron Youth Members in April 2020. Those accounts

communicated regularly with the Instagram account @oberthesober, which is controlled by Christian Mackey. The @oberthesober account made 2,417 Instagram posts in an Iron Youth Chat from June 27, 2019 through September 11, 2019.

6. Based on his Instagram posts, Mackey incites others in the Iron Youth group to violence and an attack on the “system.” In a July 2019 Instagram group chat in which Mackey participated, an Instagram user expressed a desire to train for a “devastating attack on the beast system and die as an infamous historical figure.” To this, @oberthesober responded, “Yea I’m just trying to live long enough to die attacking the sustem...System*.” @oberthesober went on to post, “We are becoming a threat to the system and they know it. If we keep pushing for shooting and training, as well as off the grid activities, we can recruit enough people to cause a collapse.”

7. @oberthesober’s posts often discuss the need and desire for killing others, as in August 2019, when he explained to the Instagram chat group that he had been looking at Nazi websites since 2016. @oberthesober posted, “I met stormfront and some guys got me on Kik. I found stormfront because as a communist I went trolling on “Nazi sites” and groups. But stormfront ended up redpilling me. That was 2016. Ever since then I have become more radical through friends and through reading Rockwell and Siege. Now I am here, as a radical jew slayer.” @oberthesober further posted “Basically, I grew up antigovernment, my father is anti-government and pro-states, but I took a liking to communism because I like control and killing. It just seemed so reasonable to me.” My understanding of the term “redpilling” is that it is used in these circles to mean that one’s

“eyes are opened” to the reality of whatever the organization believes. On the same day in August 2019, Mackey posted, “Kill niggers,” to this Instagram group chat.

7. In September 2019, an Instagram user asked in Instagram group what to do about a member of his high school whose ethnicity was 40% Ashkenazi Jew. To this question, @oberthesober replied “Kill him...him.” In another group chat in September 2019 about the Catholic Church, @oberthesober stated, “B is true but the leaders of Catholicism are jews,” and, “So to kill sin...Kill the sinners.”

8. Given the rhetoric discussed above, an undercover agent was introduced to the group and communicated with Mackey and others electronically and in person. At one such meeting, on December 9, 2020, Mackey stated, “I’m willing to do whatever it takes...if you drop me off back at my house and the feds are there waiting...I’m ready to do whatever I need to do...either to aide or defend whatever is in this movement or myself...so I’m willing to do whatever even if its totally illegal.” The conversation was recorded on an FBI recording device.

9. Also at the December 9, 2020 meeting with the undercover agent, Mackey expressed an interest in selling his rifle in order to purchase another firearm. Mackey stated that he had shot his rifle at Shoot Smart, and that it did not chamber a second round after the first round was fired. Mackey stated that another Iron Youth member had suggested he buy a “ghost gun,” and that he had been told that “ghost guns” were untraceable. The undercover agent informed Mackey that another Iron Youth member could sell Mackey a “ghost gun.” Mackey was receptive to the UCE asking this other

member about selling Mackey a "ghost gun." The conversation was recorded on an FBI recording device.

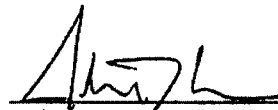
10. On January 26, 2021, the FBI Undercover Agent discussed with Mackey the purchase of a new gun and the sale of Mackey's rifle. The Undercover Agent informed Mackey that he had someone that would buy the gun, and that person would send a woman to meet Mackey to purchase the gun. Mackey informed the Undercover Agent that he no longer wanted to purchase a "ghost" pistol, but that he wanted a rifle. Mackey stated he wanted a reliable gun that, "Can stop a hoard of you know what." The Undercover Agent informed Mackey that the woman buying the gun would be a felon. To this Mackey replied, "Ok....Listen, as long as the ship sails smoothly, and the deal is done, I could care less who does what, ya know? I don't care if they're a felon as long as they're cool with it. And as long as they're not gonna pick me up when I go to do whatever. I don't care who comes." The Undercover Agent later elaborated, "It's not completely above board." To this Mackey replied, "Oh yeah, I get that. That's fine." The conversation was recorded on an FBI recording device.

11. On January 29, 2021, Mackey sold his Anderson Manufacturing AM-15 rifle to a paid FBI Source who has multiple felony convictions, including a May 24, 2001 Aggravated Assault With a Deadly Weapon conviction and an August 8, 2008 Escape While Arrested/Confined conviction. The FBI Undercover Agent instructed Mackey to meet the gun buyer at a gas station located at 301 West Marshall Drive, #4300, Grand Prairie, Texas 75051. Mackey approached the FBI Source's vehicle on foot at approximately 4:29 p.m., and got in the vehicle. The FBI Source drove to an adjacent

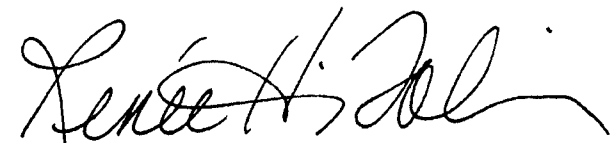
parking lot, and bought Mackey's rifle for \$800. During the exchange, Mackey asked the FBI Source if she was "based," a term widely used in white-supremacist circles to mean having white-supremacist ideology. Mackey went on to tell the FBI Source that he heard she was a felon, and that he didn't care if "Santa Claus or the Devil comes." The sale of the firearm was recorded on an FBI recording device.

12. Immediately following the gun sale, SA John Moore took possession of the firearm evidence from the FBI Source. SA Moore recorded the firearm as an Anderson Manufacturing AN-15 rifle, with a serial number of 17141419.

13. In light of the foregoing, I respectfully submit that there is probable cause to believe that, on or about January 29, 2021, Christian Michael Mackey did knowingly sell or otherwise dispose of any firearm or any person knowing or having reasonable cause to believe that such person had been convicted in any court of a crime punishable by imprisonment for a term exceeding one year.


John Moore
Special Agent, FBI

Agent sworn and signature confirmed by reliable electronic means pursuant to Fed. R. Crim. P. 4.1 on this 3rd day of February, 2021.


RENEE HARRIS TOLIVER
United States Magistrate Judge